

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ERNIE HINES D/B/A COLORFUL MUSIC,

Plaintiff,

v.

ROC-A-FELLA RECORDS INC, DEF JAM
RECORDINGS INC., UNIVERSAL MUSIC
GROUP, SONY MUSIC HOLDINGS INC.,
SHAWN CARTER p/k/a JAY-Z and
TIMOTHY MOSLEY p/k/a TIMBALAND,

Defendants.

CASE NO. 19-CV-04587-JPO

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that Defendants Roc-A-Fella Records, LLC (sued incorrectly as Roc-A-Fella Records Inc.) and Def Jam Recordings, a division of UMG Recordings, Inc. (sued incorrectly as Def Jam Recordings Inc. and Universal Music Group) (collectively, “Moving Defendants”), hereby respectfully move this Court pursuant to Fed. R. Civ. P. 12(b)(6) for an Order dismissing Count I for Copyright Infringement in Plaintiff’s First Amended Complaint.

In support of this Motion, Moving Defendants submit the accompanying Memorandum of Law dated August 21, 2019, and the accompanying Declaration of Christine Lepera dated August 21, 2019, and the exhibits attached thereto.

DATED: New York, New York
August 21, 2019

MITCHELL SILBERBERG & KNUPP LLP

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Records, LLC and Def Jam Recordings, a
division of UMG Recordings, Inc.*